

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**SUPPLEMENTAL DECLARATION OF
JOHN K. KIM REGARDING PLAN SUPPORT AGREEMENTS**

I, John K. Kim, hereby declare under penalty of perjury:

I am the Chief Legal Officer of LTL Management LLC, a North Carolina limited liability company (the “Debtor”) and the debtor in the above-captioned chapter 11 case. I have held this position with the Debtor since its formation on October 12, 2021.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

On April 4, 2023 (the “Petition Date”), I submitted a declaration describing the Debtor, its history, its assets and liabilities and the events leading to the commencement of the Chapter 11 Case. *See Declaration of John K. Kim in Support of First Day Pleadings* [Dkt. 4] (the “First Day Declaration”).² I submit this declaration to supplement the First Day Declaration with information regarding additional plan support agreements entered into after the filing of this chapter 11 case. Except as otherwise indicated, all facts and statements set forth in this Declaration are based upon: (a) my personal knowledge; (b) information supplied to me by other members of the Debtor’s or Johnson & Johnson’s management, professionals or employees; (c) my review of relevant documents; and/or (d) my opinion based upon my experience and knowledge of the Debtor’s assets, liabilities and financial condition. If called upon to testify, I could and would testify to the facts and opinions set forth herein.

Following the Petition Date, plan support agreements have been executed with six additional law firms who represent approximately 2,500 talc claimants with ovarian cancer claims against the Debtor. The approximate number of talc claimants subject to each plan support agreement is provided below. Copies of these plan support agreements (without exhibits) are attached as set forth below.

- Andrews & Thornton, AAL, ALC (approximately 2,011 claimants), **Exhibit A**
- Bisnar Chase Personal Injury Attorneys, LLP (approximately 200 claimants), **Exhibit B**
- De La Rosa Law, P.A. (approximately 100 claimants), **Exhibit C**
- Heninger Garrison Davis, LLC (approximately 97 claimants), **Exhibit D**
- Paul LLP (approximately 17 claimants), **Exhibit E**

² Capitalized terms not otherwise defined herein have the meanings given to them in the First Day Declaration.

- Singleton Schreiber LLP (approximately 144 claimants), **Exhibit F**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 2, 2023

/s/ John K. Kim
John K. Kim